

William T. Payne (SBN 90988)
Ellen M. Doyle (Pro Hac Vice)
Edward J. Feinstein (Pro Hac Vice)
FEINSTEIN DOYLE PAYNE
& KRAVEC, LLC
429 Forbes Avenue, 17th Floor
Pittsburgh, PA 15219
412-281-8400 (T), 412-281-1007 (F)
wpayne@stemberfeinstein.com
edoyle@stemberfeinstein.com
efeinstein@stemberfeinstein.com

Mark A. Potashnick (Pro Hac Vice)
WEINHAUS & POTASHNICK
11500 Olive Blvd., Suite 133
St. Louis, MO 63141
314-997-9150 (T), 314-997-9170 (F)
markp@wp-attorney.com

Ira Spiro (SBN 67641)
Jennifer Connor (SBN 241480)
SPIRO LAW CORP.
11377 W. Olympic Blvd., 5th Floor
Los Angeles, CA 89064
310-235-2350 (T), 310-235-2351 (F)
ira@spiralawcorp.com
jennifer@spiralawcorp.com

Attorneys for Plaintiffs
CHRISTOPHER OTEY, MARY GRETH &
THE CONDITIONALLY CERTIFIED FLSA
COLLECTIVE ACTION CLASS

Tracy Thompson (SBN 88173)
tt@millerlawgroup.com
M. Michael Cole (SBN 235538)
mmc@millerlawgroup.com
MILLER LAW GROUP
A Professional Corporation
111 Sutter Street, Suite 700
San Francisco, CA 94104
Tel. (415) 464-4300
Fax (415) 464-4336

Attorneys for Defendants
CROWDFLOWER, INC., LUKAS BIEWALD,
and CHRIS VAN PELT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHRISTOPHER OTEY & MARY GRETH, on
behalf of themselves and all others similarly
situated,

Plaintiff,

v.

CROWDFLOWER, INC., LUKAS BIEWALD
AND CHRIS VAN PELT,

Defendant(s).

Case No.: 3:12-cv-05524-JST/MEJ

**JOINT STIPULATION FOR BRIEF TWO-
WEEK EXTENSION OF TIME TO FILE NEW
MOTION FOR SETTLEMENT APPROVAL
AND**

[PROPOSED ORDER]

Complaint filed: October 26, 2012

1 Plaintiffs CHRISTOPHER OTEY and MARY GRETH ("Plaintiffs") and
 2 Defendants CROWDFLOWER, INC., LUKAS BIEWALD, and CHRIS VAN PELT
 3 ("Defendants"), by and through their respective counsel, hereby enter into the following Joint
 4 Stipulation for Brief Two-Week Extension of Time to File New Motion for Settlement
 5 Approval. Specifically, by and through this Stipulation, the parties request that the Court
 6 continue the parties' deadline for filing a renewed motion for preliminary settlement approval
 7 up to and including July 28, 2014.

8 STIPULATION

9 1. On April 15, 2014, this Court denied Plaintiff's Motion for Approval of Proposed
 10 Settlement without prejudice. Doc. 195.

11 2. In that Order, the Court permitted the Plaintiffs to file a new motion for
 12 settlement approval by July 14. *Id.*

13 3. The parties have corresponded / negotiated regarding terms of a new
 14 settlement agreement and submission of a new motion for settlement approval, but they
 15 need an **additional two weeks** to attempt to agree on certain new terms of settlement and
 16 for Plaintiffs' counsel to prepare a new motion for settlement approval.

17 4. Such continuance will help facilitate a successful resolution.

18 WHEREFORE, the parties mutually request that the Court enter the proposed Order
 19 below, thereby continuing the deadlines for filing a new motion for settlement approval.

21 Respectfully submitted,

22 Dated: July 11, 2014

WEINHAUS & POTASHNICK

24 By: /s/ Mark Postaschnick
 25 Mark Potashnick
 26 Attorneys for Plaintiffs
 27 CHRISTOPHER OTEY, MARY GRETH
 28 and the conditionally FLSA collective
 action class

1 Dated: July 11, 2014

MILLER LAW GROUP
A Professional Corporation

2
3
4 By: /s/ Tracy Thompson
Tracy Thompson
Attorneys for Defendants
CROWDFLOWER, INC., LUKAS
BIEWALD, and CHRIS VAN PELT

5
6
7
8 **~~PROPOSED~~ ORDER**

9 Good cause appearing therefore, the foregoing Joint Stipulation for Brief Two-
10 Week Extension of Time to File New Motion for Settlement Approval ("Stipulation") is hereby
11 approved and it is hereby ordered that:

12 Plaintiffs may file a new motion for settlement approval by July 28, 2014.

13
14 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

15
16 Dated: July 15, 2014



26 4844-5464-3228, v. 1